

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**PLAINTIFFS' FOURTH JOINT REQUEST FOR PRODUCTION
OF DOCUMENTS AND INSPECTION OF THINGS
TO STATE DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure (“Rule[s]”), Plaintiffs request that Defendants Secretary of State Brad Raffensperger, the State Election Board, and the State Election Board Members (collectively, the “State Defendants”) produce and make available for inspection the documents on an expedited basis electronically stored information and tangible things specified herein below in this Set of Requests for Production (the “Requests”).

Definitions

Plaintiffs hereby incorporate by reference all definitions provided in the Plaintiffs' August 3, 2020 Joint Request for Production of Documents and Inspection of Things to State Defendants.

Instructions

Plaintiffs hereby incorporate by reference all instructions provided in the Plaintiffs' August 3, 2020 Joint Request for Production of Documents and Inspection of Things to State Defendants.

REQUESTS FOR PRODUCTION

Request for Production No. 19:

One of each of the following, including all necessary underlying software, passcodes, usernames, and any other materials or keys required to access the devices and information listed below:

- a. A copy of the EMS database for all counties prior to the discovery of the database issue referenced in the September 25, 2020, 4:25 p.m. e-mail from Chris Harvey (Dkt. No. 916 at 9);
- b. A copy of ImageCast Central election files for Fulton County, as provisioned from the database in (a);

- c. For a representative polling place in Fulton County, as provisioned from the database in (a):
1. A USB drive containing information from “GA ICX BMD” programming group
 2. A programmed Compact Flash Card for Polling Place Scanner and “rezero” passcode
 3. A programmed Security Key Tab for Polling Place Scanner and passcode
 4. A programmed Technician Card and passcode
 5. A programmed Poll Worker Card and passcode
 6. A document of Ballot Activation Codes.

Request for Production No. 20:

One copy of the Democracy Suite EMS software, version 5.5A(GA), including the following:

- a. A copy of the Democracy Suite EMS software, version 5.5A(GA) installation disk used to provision EMS and ICC systems in Georgia;
- b. Any necessary installation keys or passwords;
- c. ImageCast Central software; and,
- d. Election Event Designer software.

Request for Production No. 21:

One hard disk image of a fully-configured EMS.

Request for Production No. 22:

One hard disk image of a fully-configured ICC.

Request for Production No. 23:

One of each of the following after corrective actions and testing by Dominion Systems, Inc., including all necessary underlying software, passcodes, usernames, and any other materials or keys required to access the devices and information listed below:

- a. A copy of the EMS database for all counties;
- b. A copy of ImageCast Central election files for Fulton County, as provisioned from the database in (a);
- c. For a representative polling place in Fulton County, as provisioned from the database in (a):
 1. A USB drive containing information from “GA ICX BMD” programming group
 2. A programmed Compact Flash Card for Polling Place Scanner and “rezero” passcode
 3. A programmed Security Key Tab for Polling Place Scanner and passcode
 4. A programmed Technician Card and passcode
 5. A programmed Poll Worker Card and passcode
 6. A document of Ballot Activation Codes.

Respectfully submitted this 27th day of September, 2020.

/s/ David D. Cross

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of LR 5.1, using font type of Times New Roman and a point size of 14.

/s/ David D. Cross
David D. Cross

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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2020, a copy of the foregoing
**PLAINTIFFS' FOURTH JOINT REQUEST FOR PRODUCTION OF
DOCUMENTS AND INSPECTION OF THINGS TO STATE DEFENDANTS**
was served on all counsel of record by electronic delivery of a PDF version.

/s/ David D. Cross
David D. Cross